

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MCRA Y BRISCOE BRIGHT;
CHARLES MCFERREN JR.; and
FRANCISCO BOWLING

CASE NUMBER: 22 CR 651

UNDER SEAL

FILED
12/15/2022
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about October 24, 2022, at Evanston, in the Northern District of Illinois, Eastern Division, the defendants violated:

Code Section

Title 18, United States Code, Section
2113(a)

Offense Description

by force and violence, and by intimidation, took from the person and presence of a bank employee approximately \$27,742 in United States Currency belonging to, and in the care, custody, control, management, and possession of Bank of America, located at 1336 Chicago Avenue in Evanston, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Herbert E. Hogberg III

HERBERT E. HOGBERG III

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 15, 2022

Gabriel A. Fuentes

Judge's signature

City and state: Chicago, Illinois

GABRIEL A. FUENTES, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, HERBERT E. HOGBERG III, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been since approximately 2002. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including, among others, bank robbery and the apprehension of violent fugitives. I have experience investigating bank robberies committed by multiple conspirators involving the use of cellular devices.

2. This affidavit is submitted in support of a criminal complaint alleging that MCRA Y BRISCOE BRIGHT, CHARLES MCFERREN, JR., and FRANCISCO BOWLING have violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BRIGHT, MCFERREN, and BOWLING with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information that appears in law enforcement

records, interviews of witnesses, my review of surveillance videos and images, my training and experience, and the experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Summary of Probable Cause

4. In summary, and as described further below, based on surveillance video and images, witness interviews, and law enforcement's investigation, there is probable cause to believe that on October 24, 2022, BRIGHT, MCFERREN, and BOWLING robbed the Bank of America located at 1336 Chicago Avenue, Evanston, Illinois 60201 (the "Evanston Bank of America").

5. In summary, on October 24, 2022 at approximately 1:15 p.m., individuals later identified as BRIGHT, BOWLING, and MCFERREN entered the Evanston Bank of America. BRIGHT jumped over the counter and used Victim Teller 1's keys to open his/her teller drawer while MCFERREN and BOWLING stood guard in the lobby and BOWLING displayed a handgun. BRIGHT, BOWLING, and MCFERREN escaped with approximately \$27,742 from the teller drawer before fleeing eastbound from the bank. Individual A¹ drove the getaway car, a black 2003 Chevrolet Avalanche bearing temporary Illinois registration 253 AB 953 (the "Subject Vehicle").

6. About 45 minutes prior to the commission of the Evanston robbery, BRIGHT, BOWLING, and MCFERREN were observed in a Bank of America branch located on the 200 block of Kensington Road in Mount Prospect, Illinois (the "Mount

¹ The identify of Individual A is known to law enforcement.

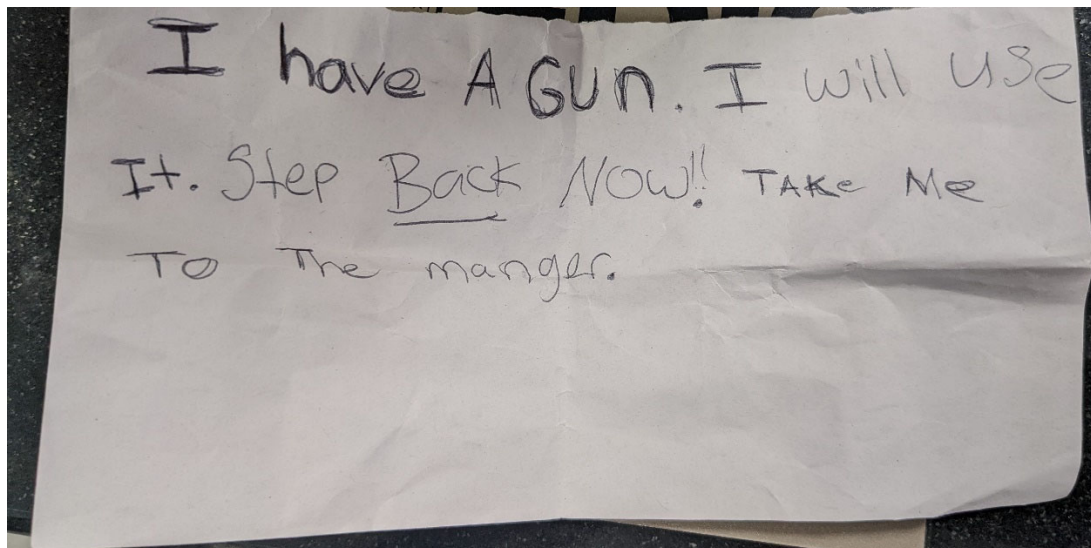
Prospect Bank of America”), though they did not rob the Mount Prospect Bank of America. Minutes before they were seen inside the Mount Prospect Bank of America, MCFERREN was observed in the Subject Vehicle, and BRIGHT and BOWLING were observed near the Subject Vehicle in the vicinity of the Mount Prospect Bank of America.

B. October 24, 2022 Robbery of the Evanston Bank of America

1. Account of Victim Teller 1

7. According to Victim Teller 1, Victim Teller 1 was the only person working as a teller at the Evanston Bank of America at approximately 1:15 p.m. on October 24, 2022.

8. According to Victim Teller 1, Offender 1, later identified as BOWLING, approached Victim Teller 1’s workstation and presented a note to Victim Teller 1. Law enforcement recovered a handwritten note that read: “I have a gun. I will use it. Step back now! Take me to the manger [sic],” as depicted below:



9. According to Victim Teller 1, upon reading the note and realizing that he/she was being robbed, Victim Teller 1 became fearful for his/her safety.

10. According to Victim Teller 1, at approximately the same time Offender 1 handed him/her a note, Offender 3, later identified as BRIGHT, jumped over the counter while yelling words to the effect of, “hands up, don’t move.” Offender 3 grabbed Victim Teller 1’s right arm. and took Victim Teller 1 to the back of the bank toward the vault area. Upon reaching the vault area, Offender 3 told Victim Teller 1 words to the effect that Victim Teller 1 needed to open the vault if Victim Teller 1 wanted to see his/her family again. Victim Teller 1 told Offender 3 that Victim Teller 1 was unable to open the vault without another employee, but told Offender 3 that there was cash in Victim Teller 1’s drawer.

11. According to Victim Teller 1, Offender 3 then took Victim Teller 1 back to Victim Teller 1’s workstation. Offender 3 used Victim Teller 1’s keys to open two teller drawers. Offender 3 removed approximately \$27,742 from the teller drawers.

12. According to Victim Teller 1, Offender 3 then said words to the effect of “Good job, buddy. You get to go home to your family.”

13. According to Victim Teller 1, he/she observed Offender 2, later identified as MCFERREN, with Offender 1 and Offender 3 and noted that Offender 2 stayed near the east door of the bank.

14. According to Victim Teller 1, all three subjects fled out the east doors of the Evanston Bank of America.

15. Victim Teller 1 described Offender 1 as a black male, approximately 5'9" in height, approximately 190 pounds, possibly with acne scarring on his face, wearing a surgical mask, navy blue medical scrubs, and purple nitrile gloves.

16. Victim Teller 1 described Offender 2 as a black male, heavy set, wearing a light-colored short sleeve shirt.

17. Victim Teller 1 described Offender 3 as a black male, approximately 6'0" to 6'1" in height, with a thin build, late 20s to early 30s wearing a black facial covering, an orange construction vest, light blue jeans with white paint on them, tan construction boots with white paint on them, and a strong odor of marijuana about his person. Victim Teller 1 described Offender 3 as frantic and believed Offender 3 to be the leader of the three.

2. Law Enforcement Investigation

18. Based on my review of the Evanston Bank of America's video security footage, at approximately 1:13 p.m., a dark colored pickup truck traveled eastbound on Greenwood Street from Sherman Avenue, one block west of the bank. The pickup truck was a dark colored pickup truck with front and rear doors and a covering over the bed. The truck pulled over to the south curb of Greenwood Street just west of the Evanston Bank of America. According to the footage, Offender 1 and Offender 2 exited the passenger side of the vehicle and walked eastbound on the sidewalk on Greenwood Street toward the Evanston Bank of America. Offender 1 and Offender 2 entered the west doors of the Evanston Bank of America.

19. Based on my review of the bank's security footage, Offender 3 entered through the east doors of the Evanston Bank of America approximately 30 seconds after Offender 1 and Offender 2 entered through the west doors.

20. According to the surveillance footage, Offender 1 passed a note to Victim Teller 1 at approximately 1:15 p.m. Approximately 13 seconds later, Offender 3 jumped over the counter and approached Victim Teller 1. Offender 3 then grabbed Victim Teller 1 and pushed Victim Teller 1 to the rear area of the teller line.

21. According to security footage, Offender 1 pulled a dark semi-automatic handgun from his waistband. Offender 1 held the gun near his thigh and looked around the lobby area.



22. Security camera footage shows that Offender 2 stood in the customer area of the Evanston Bank of America near the east door of the bank as the robbery took place with a cell phone in his hand.

23. According to security footage, Offender 3 and Victim Teller 1 went to the vault room and were in the vault room for approximately 15 seconds. Offender 3 and Victim Teller 1 then returned to the teller line. Offender 3 pointed to the teller drawer area. Offender 3 bent down to the teller drawers and appeared to open them and remove currency.

24. Based on security footage, at approximately 1:16 p.m., Offender 3 jumped back over the counter with currency in his right hand. Offender 1, Offender 2, and Offender 3 then left together through the bank's east doors.

25. Based on my review of surveillance footage and witness interviews, Offender 1 is a black male, about 5'09", about 190 pounds, in his early 30s, with possible heavy acne scarring on face. Based on security footage, Offender 1 appeared to have a short beard or facial hair on his face. Security surveillance shows Offender 1 in blue surgical scrubs, a black and gray beanie, purple nitrile or latex gloves, and a surgical mask, as depicted below. Offender 1 was wearing shoes that appeared to be black Crocs.



26. Based on my review of surveillance footage and witness interviews, Offender 2 is a black male about 5'08"-5'10", who weighs about 170-190 pounds, and is in his mid-to-late 30s. Security camera footage shows Offender 2 in gray sweatpants with green and yellow colored writing on the front of the left hip/thigh area, a light blue hooded jogging top with a dark chevron pattern on the chest, a flat brimmed cap under the hood of the windbreaker, and white high-top shoes. Offender 2's face was not covered in security camera footage. Offender 2 had a mustache and goatee and was wearing sunglasses at the time of the robbery, as depicted below. Law enforcement subsequently recovered sunglasses that appear to be the sunglasses worn by Offender 2 from the Subject Vehicle.



27. Based on my review of surveillance footage and witness interviews, Offender 3 is a male black, about 6'00" to 6'01", thin build, about 160-170 pounds, and in his late 20s to early 30s. According to security camera footage, Offender 3 wore a gray hooded sweatshirt with a black rectangle on the left arm and an "Air Jordan" emblem on the lower left front, a neon orange construction-type vest, jeans with white patches that appears to be paint on them, a white hardhat with the word "PARSEC" written on the front, purple latex or nitrile gloves, a black neck gaiter covering his nose and the lower portion of his face, and tan construction boots with white patches that appear to be paint, as depicted below.



28. According to records maintained by the Federal Deposit Insurance Corporation (FDIC) and documentation provided by Bank of America, the bank's deposits were insured by the FDIC at the time of the robbery.

3. Account of Witness 1

29. At the time of the robbery, Witness 1 was in the area of Greenwood Street and Hinman Avenue, one block east of the Evanston Bank of America. Witness 1 observed a pickup truck on the south side of Greenwood Street facing eastbound. According to Witness 1, the pickup truck was bronze or dark brown in color and had a bed cover and a yellow temporary license plate. Witness 1 observed two black males walking quickly and crouched over south of Greenwood Street. They entered the pickup truck parked on Greenwood Street. Both black males entered the passenger side of the pickup truck, and Witness 1 believes he/she may have observed

another individual sitting in the driver's seat of the pickup truck. Witness 1 observed the pickup truck depart eastbound on Greenwood Street and then northbound on Hinman Avenue.

C. The Mount Prospect Bank of America

30. In summary and as described below, approximately 45 minutes prior to the robbery of the Evanston Bank of America, Offender 1, Offender 2, and Offender 3 were captured on security cameras entering the Mount Prospect Bank of America and leaving the bank without robbing it. Security footage from a nearby store shows Offender 2 riding in the passenger seat of a dark colored pickup truck with front and rear doors and a covering over the bed that appears to be the Subject Vehicle. Approximately 36 minutes after Offenders 1, 2, and 3 left the Mount Prospect Bank of America, Evanston Police Department traffic cameras observed the Subject Vehicle at a location on the most likely route between the Mount Prospect Bank of America and the Evanston Bank of America.

31. I reviewed security footage from a retail store (Retail Store A) located on the 300 block of Kensington Road in Mount Prospect, Illinois. The Mount Prospect Bank of America is located west of Retail Store A on the 200 block of Kensington Road.

32. According to Retail Store A footage, at approximately 12:19 p.m. on October 24, 2022, a black pickup truck that I believe to be the Subject Vehicle based on its appearance, the lack of a front license plate, the presence of a rectangular white placard that is visible on the driver's side of the dashboard, and the facts described

below, turned westbound on an access road north of the Retail Store A parking lot and then turned southbound toward the eastern portion of Retail Store A. At approximately 12:21 p.m., the Subject Vehicle turned eastbound in front of Retail Store A. An individual who appears to be Offender 2 based on his clothing, facial hair, and flat-brimmed cap is visible in the passenger seat of the Subject Vehicle, as depicted below.



33. According to Retail Store A security footage, at approximately 12:21 p.m., the Subject Vehicle exited the Retail Store A parking lot and traveled westbound on Kensington Road, toward the Mount Prospect Bank of America, before leaving view of Retail Store A cameras.

34. According to Retail Store A security footage, at approximately 12:22 p.m., an individual who appears to be Offender 1 based on his physical appearance and clothing, walked westbound on the sidewalk on the north side of Kensington Road, just south of Retail Store A.

35. Approximately two minutes later, at approximately 12:23 p.m., the Subject Vehicle traveled back eastbound on Randhurst Village Drive and entered the Retail Store A parking lot coming from the direction of the Mount Prospect Bank of America. An individual appearing to be Offender 2 based on his clothing is again visible in the passenger seat. Another individual is visible driving the vehicle, as depicted below.



36. According to Retail Store A footage, after making several turns in the Retail Store A parking lot, the Subject Vehicle traveled westbound through the Retail Store A parking lot and onto Randhurst Village Drive at approximately 12:25 p.m.

37. Retail Store A surveillance footage shows that the Subject Vehicle has a yellow rear license plate that was partially blocked by a black object, as shown below. Based on my training and experience, I know that Illinois temporary registration license plates are yellow. At approximately 12:25 p.m., the truck left the view of Retail Store A's cameras in the direction of the Mount Prospect Bank of America.



38. I also reviewed surveillance footage from the Mount Prospect Bank of America. I observed that individuals who appeared to be Offender 1 and Offender 3 based on their clothing and appearance walked westbound from the area of Retail Store A and the adjacent gas station toward the east side of the Mount Prospect Bank of America at approximately 12:25 p.m. The individual who appeared to be Offender 3 stopped on the east side of Randhurst Village Drive, approximately even with the vehicle entrance for the Mount Prospect Bank of America's east parking lot.

39. According to surveillance footage, at approximately 12:25 p.m., Offender 2 exited the front passenger door of the Subject Vehicle on Randhurst Village Drive, just south of the vehicle entrance to the Mount Prospect Bank of America's east parking lot. Approximately 8 seconds later, Offender 2 began walking toward the bank's parking lot.

40. According to surveillance footage, at approximately 12:26 p.m., Offender 1 entered the east side of the Mount Prospect Bank of America. Offender 1 is visible on security footage wearing blue surgical scrubs, a surgical mask, a beanie,

and purple nitrile or latex gloves. Offender 1 stood in the teller line and appeared to direct his attention to the bank's east door.



41. According to surveillance footage, at approximately 12:26 p.m., Offender 3 opened the bank's east door. Approximately four seconds later, Offender 2 entered the bank through the same door. Offender 3 is visible wearing a gray hooded sweatshirt, a neon orange construction-type vest, a white hardhat with the word "PARSEC" written on it, and a black neck gaiter covering his face. Offender 3 is also visible carrying a cellular phone. Offender 2 is wearing a light blue windbreaker with a dark colored chevron pattern on the chest.



42. At approximately 12:26 p.m., surveillance footage shows that Offender 2 stood in front of an ATM in the lobby of the Mount Prospect Bank of America, partially blocking the ATM camera's view of Offender 1 and 2. Offender 2 stood at this ATM for approximately 3 minutes and 15 seconds, apparently acting as if he were using the ATM.



43. According to security footage, at approximately 12:29 p.m., Offender 3 exited the bank after standing in the teller line since entering the bank.

Approximately 1 second later, Offender 1 also left the teller line and exited the bank. Offender 2 continued to stand in front of the ATM for approximately one additional minute before exiting the bank.

44. Security footage showed that after exiting through the bank's east doors at approximately 12:29 p.m., Offender 1 walked east across the parking lot toward Randhurst Village Drive. Offender 3 also crossed Randhurst Village Drive and started walking southbound on Randhurst Village Drive before turning eastbound and leaving the view of the bank's cameras. Offender 1 walked toward the Offender 3's location and continued eastbound until out of view of the bank's cameras. Offender 2 exited the bank eastbound and crossed Randhurst Village Drive, and then turned southbound toward Kensington Road.

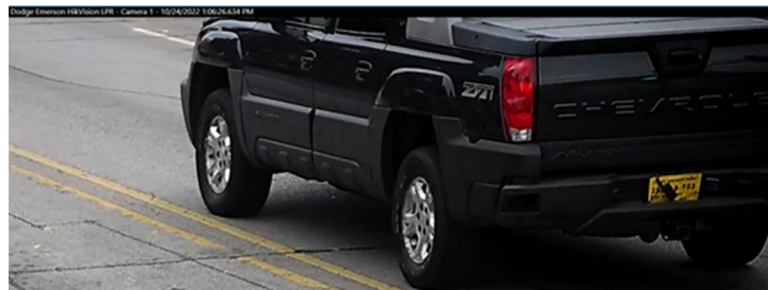
45. Based on my training and experience and an internet search, I know that it takes approximately 35 to 40 minutes to drive from the Mount Prospect Bank of America to the Evanston Bank of America. Because it is the most direct major road between the two locations, the most likely route of travel between the two locations is to travel eastbound on Golf Road, which becomes Emerson Street when it enters Evanston.

46. According to Evanston Police Department traffic cameras, a dark in color, four door, Chevrolet Avalanche with a covered bed was observed at the intersection of Dodge Avenue and Emerson Street at approximately 1:06 p.m., approximately 36 minutes after Offenders 1, 2, 3 left the Mount Prospect Bank of America. Because it is located along the most direct major road between the two

locations, the intersection of Dodge Avenue and Emerson Street is on the most likely route between the Mount Prospect Bank of America and the Evanston Bank of America. A rectangular white placard was visible on the dashboard, and the vehicle did not have a front license plate, as shown below.



47. According to Evanston Police Department traffic camera footage, the same vehicle had a yellow rear license plate that was partially obscured by a black object.



48. Based on my review of this footage and the other evidence described in this affidavit, the vehicle depicted in this footage appears to be the Subject Vehicle.

49. Based on my review of the footage described above, the Subject Vehicle's rear license plate is an Illinois temporary registration. Part of the registration is

partially unreadable in the Evanston Police Department footage. The visible portion of the registration appeared to be 25[3 or 5] []B 953.

50. Based on my training and experience, I know that the Illinois Secretary of State assigns temporary registration numbers sequentially and that the only character that is currently in use as the first of the middle two characters is the letter A. Therefore, I determined the Illinois temporary registration of the Subject Vehicle was either 253 AB 953 or 255 AB 953.

51. A check of law enforcement databases located an Illinois Temporary Registration 253 AB 953, issued on or about October 7, 2022 for a 2003 Chevrolet Avalanche registered to Individual A.

52. A check of law enforcement databases for Illinois temporary registration 255 AB 953 located a 2012 Ford Escape registered to an owner in DeKalb, Illinois. According to a person familiar with the vehicle bearing Illinois temporary registration number 255 AB 953, the vehicle is silver in color. Based on my training and experience and an internet search, I know that a Ford Escape is a sport utility vehicle that does not have a flat bed or the word "CHEVROLET" embossed on the rear portion of the vehicle.

53. Based on the evidence described above, I determined that the Subject Vehicle bears Illinois temporary registration 253 AB 953.

D. Identification of MCFERREN as Offender 2

54. In summary, law enforcement has identified Offender 2 as CHARLES MCFERREN, JR. based on fingerprints recovered from the Evanston Bank of America and a comparison of known images of MCFERREN to security footage of the robbery.

55. According to surveillance video from inside Gas Station A, at approximately 9:54 a.m., Offender 2 was inside gas station at the southeast corner of the intersection of 67th Street and Jeffery Boulevard ("Gas Station A") with a cell phone in his hand and his face partially visible, as depicted below.



56. According to surveillance footage, at approximately 10:54 a.m., the Subject Vehicle entered the parking lot of Gas Station A from 67th Street. The Subject Vehicle parked at the gas pumps on the north side of Gas Station A. Individual A exited the Subject Vehicle and walked across Jeffery Boulevard to another gas station. According to CPD descriptions of POD camera footage, Offender 2 sat in the

front seat of the Subject Vehicle while the Subject Vehicle was parked at the Gas Station A pumps. Individual A re-entered the Subject Vehicle, which was still parked at the gas pumps at Gas Station A, at approximately 11:10 a.m. Individual A and Offender 2 departed Gas Station A in the Subject Vehicle at approximately 11:12 a.m. and proceeded eastbound on 67th Street.

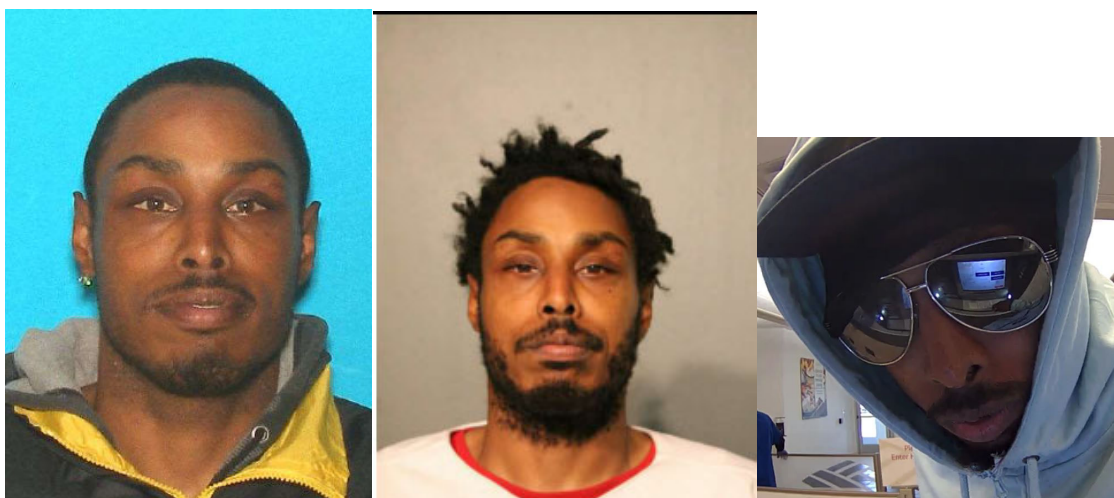
57. Based on my training and experience and an internet search, I know that the driving time between Gas Station A and the Mount Prospect Bank of America is approximately one hour. As described above, the Subject Vehicle was observed in the vicinity of the Mount Prospect Bank of America at approximately 12:19 p.m.

58. According to security camera footage from inside the Evanston Bank of America, Offender 2 did not wear gloves during the robbery. Offender 2 is visible on security camera footage placing his palm on a surface inside the Evanston Bank of America, as depicted below.



59. Law enforcement recovered palm prints from approximately the location that Offender 2's palm touched the white surface in the image above. According to analysis by the Northeastern Illinois Regional Crime Laboratory, based on the agreement of class and individual friction ridge detail in the prints recovered from the scene and prints known to be associated with MCFERREN, an identification of MCFERREN was made.

60. I obtained a 2017 driver's license photo for MCFERREN and a booking photo taken of MCFARREN in connection with an October 22, 2022 arrest. I compared those photos to images taken of Offender 2 during the course of the robbery. Based on my comparison of those images and the facts described above, I identified Offender 2 as MCFARREN.



E. Identification of BOWLING as Offender 1

61. In summary, law enforcement has identified Offender 1 as FRANCISCO BOWLING based on toll records that show a cellular phone associated with BOWLING contacted BRIGHT on the morning of the robbery from approximately

67th Street and Jeffery Boulevard, cell site data that shows a phone associated with BOWLING was in the vicinity of the Mount Prospect Bank of America at approximately 12:29 p.m., and a comparison of known images of BOWLING to security footage of the robbery.

62. Law enforcement obtained information from cellular service providers regarding cellular telephones that utilized cellular towers in the vicinity of locations where Offenders 1, 2, 3, and/or Individual A were known to be at times they were known to be there.

63. According to information received from T-Mobile, a phone number assigned the number (773) XXX-8571 received an incoming call from a phone number associated with BRIGHT at approximately 10:57 a.m. on October 24, 2022 while utilizing a cell tower in the area of 6700 South Jeffery Boulevard in Chicago, Illinois. As described above, Gas Station A is in the area of 6700 South Jeffery Boulevard.

64. According to information received from T-Mobile, a phone number assigned the number (773) XXX-8571 received an incoming call from an unknown source at approximately 12:32 p.m. on October 24, 2022. The call was not answered and was routed to voicemail. The phone assigned the number (773) XXX-8571 was utilizing a cell tower in the area of 200 East Kensington Road in Mount Prospect, Illinois at the time of this call. As described above, Offenders 1, 2, and 3 exited the Mount Prospect Bank of America at approximately 12:29 p.m. on October 24, 2022.

65. According to a check of law enforcement databases, phone number (773) XXX-8571 was listed to BOWLING at an address on the 6700 block of South Jeffery Boulevard in Chicago, Illinois.

66. I obtained a 2022 Illinois identification card photograph of BOWLING. I compared the photograph with images of Offender 1 from the robbery.



67. I observed that BOWLING's identification photograph and images of Offender 1 both appear to show a scar or other mark on the left eyebrow. I also observed that BOWLING's identification photograph and images of Offender 1 both appear to show similar dark areas under the eyes where the cheekbone meets the nose.

68. Based on the comparison of those images and the facts described above, I identified Offender 1 as BOWLING.

F. Identification of BRIGHT as Offender 3

69. In summary, law enforcement has identified Offender 3 as MCRA Y BRISCOE BRIGHT.

70. According to federal court records, BRIGHT is currently on supervised release for 2008 convictions for conspiracy to commit bank robbery, bank robbery, brandishing a firearm in furtherance of a crime of violence, and attempting to escape. *See* Case No. 06 CR 342. The United States Probation Officer responsible for overseeing BRIGHT's supervised release ("USPO 1") provided law enforcement two phone numbers that BRIGHT has used to contact him/her: Bright Phone Number 1 and Bright Phone Number 2. According to USPO 1, BRIGHT has contacted USPO 1 using Bright Phone Number 1 as recently as October 21, 2022 and Bright Phone Number 2 as recently as November 23, 2022.

71. USPO 1 told law enforcement that BRIGHT has been sporadically employed at Gas Station A and performed odd jobs.

72. According to surveillance footage from Gas Station A, at approximately 8:34 a.m. on October 24, 2022, a black male wearing a green sweatshirt, a black hat, and jeans with white splotches spoke with an individual who appears to be MCFERREN based on his facial appearance and the fact that he is wearing the same clothing that Offender 2 wore during the robbery of the Evanston Bank of America, as depicted below.



73. According to security footage from inside Gas Station A, the black male wearing a green sweatshirt entered the gas station, as depicted in the image below.



74. I obtained an Illinois driver's license photograph for BRIGHT and compared it with the images above. Based on that comparison, I believe the black male in a green sweatshirt is BRIGHT.



75. As described above, MCFERREN and Individual A departed Gas Station A at approximately 11:12 a.m. on October 24, 2022. According to toll records, Individual A received a 27 second call from Bright Phone 1 at 11:04 a.m. on October 24, 2022. According to toll records, Individual A then placed a 1 minute and 19 second call to Bright Phone 1, also at 11:04 a.m.

76. According to surveillance footage, Offender 1 was holding a cell phone as he entered the Mount Prospect Bank of America, as indicated in the image below. As described above, Offender 1, Offender 2, and Offender 3 exited the Mount Prospect Bank of America at approximately 12:29 p.m. on October 24, 2022.



77. According to toll records, Individual A received a 1 minute and 20 second phone call from Bright Phone 1 at approximately 12:30 p.m. on October 24, 2022. According to data provided by Verizon Wireless, Bright Phone 1 was utilizing a cell tower in the vicinity of the Mount Prospect Bank of America at the time of these calls.

78. According to an employee of Car Dealership A, an individual matching BRIGHT's description who provided the name MCRA Y BRISCOE BRIGHT purchased a black Jeep Grand Cherokee on October 25, 2022 for \$8,500 in cash and a promise to pay an additional \$1,500. According to an employee of Car Dealership A, BRIGHT returned the vehicle to the dealership on November 14, 2022 after claiming there was an issue with the alternator. According to an employee of Car Dealership A, BRIGHT purchased a white Jeep Grand Cherokee with Illinois license plate DS 74581 after returning the black Jeep Grand Cherokee. BRIGHT paid an additional \$1,500 cash after returning the black Jeep Grand Cherokee (for a total of \$10,000 cash) and provided a promise to pay an additional \$2,000. Law enforcement

also obtained the bill of sale for the white Jeep Grand Cherokee. According to the bill of sale, the vehicle was purchased by MCRA Y BRISCOE BRIGHT. The bill of sale listed an address on the 6800 block of South Jeffery Boulevard in Chicago and Bright Phone 2. According to a check of law enforcement databases, the white Jeep Grand Cherokee is registered to MCRA Y BRISCOE BRIGHT at an address on the 6800 block of South Jeffery Boulevard in Chicago, Illinois. The Illinois vehicle registration was issued November 15, 2022. According to the bill of sale, the purchase price was \$12,000.

79. According to information obtained from the Illinois Secretary of State and law enforcement databases, BRIGHT resides on the 6800 block of South Jeffery Boulevard in Chicago, Illinois.

80. USPO 1 told law enforcement that BRIGHT has not reported income or assets that suggest he had the ability to pay \$8,500 in cash.

II. CONCLUSION

81. Based on the information above, I respectfully submit that there is probable cause to believe that BRIGHT, MCFERREN, and BOWLING robbed the Evanston Bank of America on or about October 24, 2022, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT

Herbert E. Hogberg III

HERBERT E. HOGBERG III
Special Agent
Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone December 15, 2022.

Gabriel A. Fuentes

Honorable GABRIEL A. FUENTES
United States Magistrate Judge